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THE LAW OFFICES OF RANDOLPH H. GOLDBERG
RANDOLPH H. GOLDBERG, ESQ.
4000 S. Eastern Avenue
Suite 200
Las Vegas, Nevada 89119
(702) 735-1500
Attorney for Debtor
Nevada State Bar no. 5970

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

* * * * *

In re:)	BANKRUPTCY NUMBER:
DAVID O'LEARY &)	BK-S-09-16427-LBR
NITA O'LEARY)	Chapter 13
)	
)	
Debtor.)	Date: OST PENDING
)	Time: OST PENDING

EX PARTE MOTION FOR ORDER SHORTENING TIME

Comes now, the Debtor above-named, by and through his attorney,
Randolph H. Goldberg, Esq., and moves this Court for an Order Shortening
Time in which to hear the MOTION TO REINSTATE AUTOMATIC STAY RE:
SECURED CREDITOR DEUTSCHE BANK TO PROHIBIT SALE AND TO
REINSTATE THE AUTOMATIC STAY
in case.

This Motion is made and based upon the papers and pleadings on
file herein and upon the Affidavit of Randolph H. Goldberg, Esq. attached
hereto.

DATED this _____ day of MAY, 2010.

THE LAW OFFICE OF
RANDOLPH H. GOLDBERG, ESQ.

By_/s/RANDOLPH H. GOLDBERG, ESQ. /s/_
RANDOLPH H. GOLDBERG, ESQ.
4000 S. EASTERN AVENUE, STE. 200
LAS VEGAS, NV 89119
Attorney for Debtor

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AFFIDAVIT OF RANDOLPH H. GOLDBERG, ESQ.

5 STATE OF NEVADA)
ss:)

6 COUNTY OF CLARK)

7 RANDOLPH H. GOLDBERG, ESQ., being first duly sworn,
8 deposes and says:

9 1. That he is the attorney of record in the
10 above-
11 captioned matter and is licensed to practice law in the
12 State of Nevada.

13 2. That he is competent to testify to the matters
14 related herein to the best of his own knowledge and
15 belief.

16 3. That your affiant believes this to be an
17 urgent
18 matter in that the debtors' time frame in which to file
19 this Motion due to the fact that the residence could be sold
20 prior to a potential court date the sale of the residence
21 is scheduled for an auction date

22 Therefore, your affiant requests that the Court
23 enter its order shortening time in which to hear the
24 MOTION TO REINSTATE AUTOMATIC STAY RE: SECURED CREDITOR
25 DEUTCHE BANK TO PROHIBIT SALE AND TO REINSTATE THE AUTOMATIC
26 STAY

27 /s/ Randolph Goldberg Esq.
RANDOLPH H. GOLDBERG, ESQ.

SWORN TO AND SUBSCRIBED BEFORE ME
this 10TH day of MAY, 2010

/s/ Adam Parmelee_____

NOTARY PUBLIC in and for the
County of Clark, State of Nevada
My Commission expires April 21, 2012.

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